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February 23, 1994

HAND DELIVER

Mr. Andrew S. Fishel  
Managing Director  
Federal Communications Commission  
1919 M Street, Room 852  
Washington, D.C. 20554

Re: GEN Docket No. 90-314  
QUALCOMM Letter of February 8, 1994

Dear Mr. Fishel:

This firm represents Omnipoint Corporation ("Omnipoint"). We write in response to the claims asserted by QUALCOMM, Incorporated ("QUALCOMM") in its February 8, 1994 letter to you.<sup>1</sup> Obviously suffering from a case of sour grapes, QUALCOMM is attempting to breathe life into an argument that the Commission declared dead almost six months ago. Although, as a practical matter, no one can stop QUALCOMM from filing frivolous paper, Omnipoint respectfully submits that all the other parties to this Docket, including Omnipoint and the Commission, have more productive things to do. In light of the circumstances, the Commission should simply ignore the QUALCOMM letter.<sup>2</sup>

The QUALCOMM letter is based on a theme that QUALCOMM first raised on July 27, 1993, when it filed a "Motion for Leave to File Supplemental Comments" (the "Motion for Leave") and "Supplemental Comments" (the "Supplement") in this Docket. QUALCOMM argued in those pleadings that Omnipoint had raised, for the first time in its March 1, 1993 reply comments in this Docket, "a number of substantive and technical issues about QUALCOMM's proposed PCS system and QUALCOMM's application for a pioneer's preference" that needed to be addressed. Motion for Leave at 2. In fact, Omnipoint had not raised any new issues in its

<sup>1</sup> Letter from Veronica M. Ahern and Albert Shuldiner, attorneys for QUALCOMM Incorporated, to Andrew S. Fishel, Managing Director, Federal Communications Commission (Feb. 8, 1994) (the "QUALCOMM letter").

<sup>2</sup> While Omnipoint is not suggesting that the Commission needs to take any action on the QUALCOMM letter, to the extent the Commission feels that some action is necessary, we note that, ironically, the letter is itself an improper ex parte presentation. See, 47 C.F.R. 1.1202(b)(1).

Mr. Andrew S. Fishel  
February 23, 1994  
Page 2

reply comments, but merely had responded to claims made by QUALCOMM in its January 29, 1993 comments that it deserved an award of a pioneer's preference for its work in spread spectrum technology, while Omnipoint did not. Thus, on August 11, 1993, when Omnipoint opposed the Motion for Leave, it pointed out that the Supplement was filed 21 weeks after the pleading cycle had closed and was repetitious. On August 27, 1993, the Commission apparently agreed, as it denied the Motion for Leave and specifically ruled that the arguments contained in the Supplement "WILL NOT be considered in this proceeding."<sup>3</sup>

QUALCOMM did not seek review or reconsideration of the August 27 Order through established Commission procedures. Instead, on September 15, 1993, the day before the Sunshine Act went into effect in this Docket, QUALCOMM repackaged the same arguments in a "Motion to Strike" (the "September 15 Motion") Omnipoint's August, 1993 Semi-Annual Experimental License Progress Report (the "Experimental Report"). QUALCOMM claimed that the Experimental Report violated the Commission's ex parte rules because Omnipoint was using it to comment on QUALCOMM's rejected July 27 Supplement. Obviously, the September 15 Motion was nothing more than a late-filed attempt to evade the consequences of the Commission's August 27 Order.

On September 29, 1993, Omnipoint opposed QUALCOMM's September 15 Motion on several grounds.<sup>4</sup> First, Omnipoint's Experimental Report did not make any comments with respect to whether QUALCOMM deserved a pioneer's preference. Second, Omnipoint merely described the QUALCOMM approach as embodied in public documents filed by QUALCOMM and by APC, without making any disparaging remarks. The fact that QUALCOMM interprets an accurate description of its system as an attack speaks for itself. Further, Omnipoint never suggested, by its attachment to the September 29 Opposition, that the Experimental Report violated ex parte rules. Rather, the alternative submission, which deleted all references to QUALCOMM, showed the absurdity of QUALCOMM's September 15 Motion by demonstrating that the exact same positions stated in the Experimental Report would hold without any reference to QUALCOMM. Finally, the QUALCOMM letter implies that Omnipoint's Experimental Report, which repeated other companies' descriptions of QUALCOMM's system, somehow contributed to the Commission's decision not to award QUALCOMM a pioneer's preference. This implication is pure fiction, given that the Commission never once referenced the Experimental Report in its written decision to deny QUALCOMM's preference request.<sup>5</sup> In fact, QUALCOMM's preference was denied not on the basis of the performance of its system, but on the basis that the QUALCOMM proposal at 1.9 GHz was the same as its 800 MHz system.

<sup>3</sup> Order, GEN Docket No. 90-314, DA 93-1055 (OET, released August 30, 1993) at 2 (emphasis in original) (the "August 27 Order").

<sup>4</sup> *See*, Omnipoint's "Opposition to Motion to Strike," filed in this Docket on September 29, 1993 (the "September 29 Opposition"). In addition to the points made below, we note that the filing of Omnipoint's Experimental Report could not have violated the Commission's ex parte rules. *See*, 47 C.F.R. §1.1204(b).

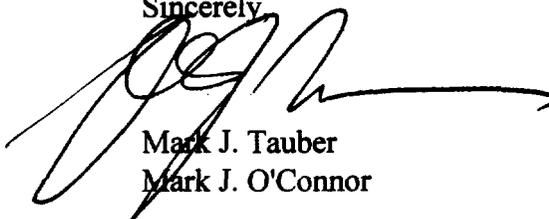
<sup>5</sup> *See*, Third Report and Order, GEN Docket No. 90-314, at ¶¶252-266 (released February 3, 1994).

Mr. Andrew S. Fishel  
February 23, 1994  
Page 3

In that context, the QUALCOMM letter must be viewed as simply another attempt to end-run the Commission's August 27 Order. True to QUALCOMM's penchant for late filings, the letter requests, under the guise of reporting an ex parte violation that allegedly occurred more than five months ago, that the Commission decide QUALCOMM's Motion to Strike, which itself was an improper attempt to revisit the substance of the Commission's August 27 Order.<sup>6</sup> QUALCOMM is apparently disappointed that the Commission's Third Report and Order in this Docket did not specifically address its Motion to Strike. However, that motion was already moot at the time it was filed. There really was no need for the Commission to decide the issue again. QUALCOMM is simply the victim of its own failure to seek review or reconsideration of the August 27 Order properly. See 47 C.F.R. §1.276.

Omnipoint respectfully submits that the QUALCOMM letter does not merit any attention from the Commission. QUALCOMM is convinced that if it dresses its claim in three different ways -- first as supplemental comments, then as a motion to strike, and finally as a notice of an ex parte violation -- that it can shop around the Commission for a favorable decision. The best way to counter QUALCOMM's abuse of the Commission's processes is to ignore it. Eventually, QUALCOMM will learn that it must play by the same rules as everyone else.

Sincerely,



Mark J. Tauber  
Mark J. O'Connor

cc: Parties in GEN Docket No. 90-314  
(see attached list)

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<sup>6</sup> QUALCOMM's contention that it is merely bringing an ex parte violation to the Commission's attention really is absurd, in light of the fact that it gave written notice to the Commission of its ex parte claims last September in its Motion to Strike.

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